

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**J. NOAH, B.V.** : CIVIL ACTION  
: NO. 20-cv-20560 (SDW)(LDW)

VS.

**WILLIE J. MAXWELL, II d/b/a  
ZOO GANG TOURING ET AL.**

## **DECLARATION**

I, HASAN OZTURK, hereby depose and say under penalty of perjury that the following is true and correct, to the best of my knowledge information and belief:

1. I am the Chief Executive Officer of J. NOAH, B.V., and I have firsthand knowledge in regard to the facts set forth in the Complaint, and the facts set forth in the Motion for Default Judgment.
  2. I have read the Motion for Default Judgment, and the facts in that motion and the Exhibits attached are accurate, true and correct.
  3. Further, I prepared all of the documents set forth in the Exhibits to the Motion for Default Judgment; I have first hand knowledge of the money paid to the defendants, I have firsthand knowledge of the failure of the defendant MAXWELL to appear, without explanation or excuse, to the final 13 shows of the European tour for which we paid him in advance, and I have firsthand knowledge that expenses were paid to promote and market the shows, and to have deposits (unrefundable) paid to venues to secure the venues for the 13 shows which were cancelled, causing the loss of these funds.
  4. I have firsthand knowledge of repeated promises to refund this money to my company by representatives of defendants, which promises were repeatedly broken, and that I tried very hard to resort to having to sue defendants in Court.

AND SO I DECLARE AS OF THIS \_\_\_\_ DAY OF SEPTEMBER, 2021.

/Hasan Ozturk/